



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

DEC - 1 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE - 101

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. Joe Griesenauer
Owner
Terminal Freezers LLC
Lineage Logistics Company
2525 Ewald Avenue SE
Salem, Oregon 97302

Re: Risk Management Program Compliance Inspection
Terminal Freezers, LLC (Lineage Logistics Company)
EPA Facility ID# 1000 0022 3395

Dear Mr. Griesenaur:

On May 3, 2016, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Terminal Freezers, LLC facility, located at 2525 Ewald Avenue SE, Salem, Oregon. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act, also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Process Safety Information:** Terminal Freezers LLC failed to have information pertaining to the equipment in the ammonia refrigeration process on the safety systems as required by 40 CFR 68.65(d)(2)(viii). The 2013 Compliance Audit report, CA Action Item #22 (pg. 2) identified a safety issue that the NORPAC side of the facility did not have an ammonia notification system. At the time of the inspection the project was 90% complete. Audible alarms and visible strobes were not installed on the NORPAC side of the facility. Terminal Freezers LLC confirmed this action item was completed for the installation of twelve horns and strobes in July 2016.
2. **Management of Change:** Terminal Freezers LLC failed to implement written procedures to manage changes to equipment and procedures and changes that affect the ammonia refrigeration process as required by 40 CFR 68.75(a). Terminal Freezers LLC was unable to produce management of change documentation for the installation of the horns and strobes on the NORPAC side installed in July 2016.

In addition, the EPA inspectors identified the following area of concern during the facility tour:

3. Excessive ice buildup was observed on ammonia refrigeration process equipment such as insulated piping and valves in the engine rooms. Ice buildup on process equipment can lead to equipment failure causing a potential hazard in the release of ammonia. Ice buildup on process equipment must be monitored and controlled. Reference ANSI/IIAR 2-2008, with Addendum B, Appendix H (Informative), Insulation for Refrigeration Systems.

Please provide the documentation to substantiate that the areas of concern listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter. The documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, WA 98101
Fax: (206) 553-4743

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: <http://www.epa.gov/rmp/guidance-facilities-risk-management-programs-rmp>.

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,



Kelly McFadden, Manager
Pesticides and Toxics Unit